

KIRTON LAW FIRM

MEMO ENDORSED

Marlon G. Kirton, Esq.

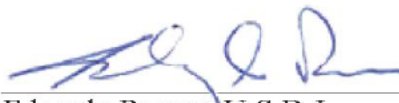
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July 2, 2025

VIA ELECTRONIC FILING

Hon. Edgardo Ramos
United States District Court
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Sentencing is adjourned to July 22, 2025, at 11 a.m.
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 7/8/2025
New York, New York

Re: *US v. Reynolds, SI 23 cr. 00038 (ER)*

Dear Judge Ramos:

I represent Derrick Reynolds in the above-referenced matter. Mr. Reynolds pleaded guilty and is scheduled for sentencing on July 16, 2025. I request a one-week adjournment.

Mr. Reynolds pleaded guilty, inter alia, to racketeering conspiracy. He faces decades in prison. I received most, though not all, of the records required for his sentencing hearing. Records from his Bronx conviction are still outstanding. I expected to receive a set of those records on Sunday. I did not receive those records; however, I expect to receive the records later this week.

The Defense believes that these records are relevant to the sentencing hearing. The Final PSR calculates that Mr. Reynolds has 10 Criminal History points, in part based on two felony convictions. One conviction is in New York County, and the other conviction is in Bronx County. The Defense believes that both convictions are relevant conduct pursuant to USSG 1B1.3 and 4A1.2; therefore, he only has 4 Criminal History Points. The Government has not agreed with the Defense's argument, and neither has US Probation.¹ The Defense has the New York County records but does not yet have the Bronx County records. The records will provide proof that the convictions are relevant conduct and could lower his Criminal History Category from V to III. I have discussed this matter with the Government. The parties agree that the Defense sentencing memorandum will be filed on or before July 9, 2025, and the Government will file a response on July 16, 2025. The Government requests a sentencing date in July 2025. I

¹ Final PSR, page 28.

have a sentencing hearing in the Southern District of New York (SDNY) on the afternoon of July 31, 2025; I am otherwise available in July. This is my third and final request for an adjournment.

Please contact me if you have any questions or concerns.

Sincerely,


Marlon G. Kirton, Esq.

cc: Alain Massena, Esq. (via electronic mail)

Brandon Harper, Assistant United States Attorney (via electronic mail)